

Post-it® Fax Note	7571	Date	8/14/08	# of pages	1
To	Hon. John F. Keenan	From			
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AUG 14 2008

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Hon. John F. Keenan, U.S.D.J.
United States District Court
500 Pearl St.
NY NY 10007

re: United States v. Yulin Wu, 08 CR 441 (JFK)

Dear Judge Keenan:

With the consent of the Government, I request that our status conference scheduled for 8/19/08 be re-scheduled to the week of September 15, 2008.

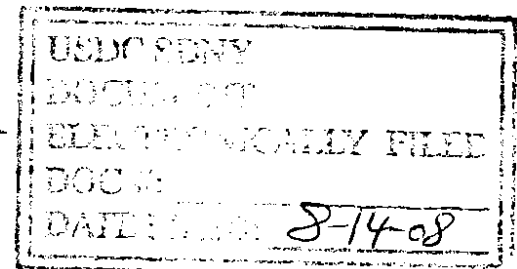
The reasons for this request are as follows: (1) I am now scheduled to be on vacation that day (if this adjournment is granted), and also for several days in each of the weeks of 9/2, 9/8 and 9/22/08, and (2) more time is needed to complete plea discussions, in part, because I am awaiting additional discovery material from the Government (wiretap applications and line sheets) which, when received, I will have to review with my client, with an interpreter, at MCC (where there is only one attorney-client visiting room equipped with a computer to review the CDs of wiretapped calls which I have already received).¹

If this request is granted, I consent on behalf of my client, Yulin Wu, to the exclusion of time to the new conference date and I note that this additional time is needed to continue plea discussions. See 18 U.S.C. Sec. 3161(h)(8)(A) (permitting exclusion of any "period of delay resulting from a continuance granted ... if the judge granted such continuance on the basis of his finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.").

Yours truly,

Henry J. Steinglass

cc.: AUSA Jenna Dabbs [via Fax (212) 637-2390]



¹If the conference is re-scheduled to 9/17, then I would appreciate a time after 11 a.m. due to an early morning court appearance already scheduled for that date; and, I hope that the conference will not be scheduled for the afternoon of 9/19 as I may have to schedule a plane trip for that afternoon.